

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

GLOBAL NAPS, INC.,

Plaintiff,

v.

**VERIZON NEW ENGLAND INC.,
d/b/a VERIZON MASSACHUSETTS,**

Defendant,

v.

**GLOBAL NAPS NEW HAMPSHIRE, INC.;
ET AL.,**

Counterclaim Defendants.

**Civil Action No. 02-12489 - RWZ
Civil Action No. 05-10079 - RWZ**

OPPOSITION TO MOTION TO SELL AIRCRAFT

In accordance with the Court's Order Establishing Procedures for Proposed Sale of Aircraft [Dkt. # 696] and based on the advice of counsel for the Receiver that because the deadline for opposition to the motion fell on a Sunday it would be extended through Monday February 21, 2011, Arltek Holdings, Inc. ("Arltek") respectfully submits this opposition to the Receiver's Motion For An Order Authorizing the Sale of Aircraft Free and Clear of All; Liens, Claims and Encumbrances [Dkt. #693].

The basis for Arltek's opposition is that Arltek has submitted a higher bid. Arltek's bid is \$250,000 higher than the Pro Star Pilatus bid. In addition, acceptance of Arltek's bid would save the Receiver the \$180,000 finder's fee the Receiver is required to pay should he accept the Pro Star Pilatus bid. In total, acceptance of Arltek's bid would net the Receiver an additional

\$430,000. Arltek's bid also is not subject to the inspection requirement included in the Pro Pilatus bid.

A copy of the letter containing the portions of the Arltek bid that pertain to the entities that own the aircraft is submitted herewith.

Dated: Stamford, Connecticut
February 21, 2011

Respectfully submitted,

ARL TEK HOLDINGS, INC.,

By its attorneys:

/s/ Eric Osterberg
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CERTIFICATE OF SERVICE

I certify that on this 21st day of February 2011, this document was filed through the Court's CM/ECF system and will be sent electronically to the registered participants as identified in the Notice of Electronic Filing (NEF). In addition, I emailed a copy of the foregoing to the Receiver and counsel for the Receiver at the following email addresses:

cjenkins@cbiztofiias.com; sjmlaw@verizon.net; dhclibbey@lawboston.com.

/s/ Eric Osterberg

Eric C. Osterberg